

# **EXHIBIT 2**

# ALSTON & BIRD

90 Park Avenue  
New York, NY 10016  
212-210-9400 | Fax: 212-210-9444

Darlena H. Subashi

Direct Dial: 212-210-1277

Email: [darlena.subashi@alston.com](mailto:darlena.subashi@alston.com)

March 22, 2022

VIA EMAIL

Bo Davis  
213 North Freedonia, Suite 230  
Longview, Texas 75601  
[bdavis@davisfirm.com](mailto:bdavis@davisfirm.com)

Re: *TQ Delta, LLC v. Nokia Corp., Nokia Solutions and Networks Oy, and Nokia of America Corp.*, Case No. 2:21-cv-309-JRG (E.D. Tex.) (Member Case)

Dear Bo:

Further to those references identified in its March 8, 2022 letter, Defendants Nokia of America Corporation, Nokia Corporation, Nokia Solutions and Networks Oy (collectively, “Nokia”) write to inform Plaintiff TQ Delta, LLC (“TQ Delta”) that Nokia has recently identified additional prior art to the Asserted Patents.

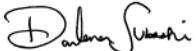
Nokia intends to promptly amend its Initial Invalidity Contentions to add the recently identified prior art. In an effort to continue to work toward narrowing the case (*see generally* Dkt. 77, Defendants’ Opposed Motion for Entry of Order Focusing Patent Claims and Prior Art), when Nokia serves its amended invalidity contentions, Nokia will identify an equal number of references that it is dropping from its invalidity contentions. In other words, Nokia’s amendment will result in a net-zero number of additional prior art references.

As of the date of this correspondence, Nokia intends to chart the following prior art references:

Bo Davis  
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- Family 1:
  - ITU-T Recommendation G.712 (11/96)
- Family 2:
  - Alcatel A1000 ASAM ADSL
- Family 4:
  - Stefan H. Müller & Johannes B. Huber, "A Comparison of Peak Power Reduction Schemes for OFDM," GLOBECOM 97. IEEE GLOBAL TELECOMMUNICATIONS CONFERENCE (1997)
  - Denis J. G. Mestdagh & Paul M. P. Spruyt, "A Method to Reduce the Probability of Clipping in DMT-Based Transceivers," IEEE TRANSACTIONS ON COMMUNICATIONS, VOL. 44, No. 10 (1996)

Nokia may add to or otherwise modify this list at the time that it serves its amended invalidity contentions.

Sincerely,  
  
Darlena Subashi